

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

United States of America,

Plaintiff,

v.

DeJuan Thornton-Bey,

Defendant.

Hon. Joan H. Lefkow

Case No. 16-cv-05532

**DEFENDANT’S UNOPPOSED MOTION
FOR AN EXTENSION TO FILE HIS REPLY BRIEF**

Defendant DeJuan Thornton-Bey (“Mr. Thornton-Bey”), by his attorneys, hereby moves this Court for an eight-day extension to give Mr. Thornton-Bey’s counsel sufficient time to complete the reply brief in support of Mr. Thornton-Bey’s *Supplemental Motion for Relief Under 28 U.S.C. § 225 Pursuant to Johnson v. United States* and to further communicate with Mr. Thornton-Bey. In support, Mr. Thornton-Bey states as follows:

1. On May 9, 2017, Mr. Thornton-Bey filed his *Supplemental Motion for Relief Under 28 U.S.C. § 225 Pursuant to Johnson v. United States*.

2. On June 30, 2017, the United States of America filed its response to the Supplemental Motion.

3. On February 7, 2018, this Court appointed John Hamill of DLA Piper LLP (US) (“DLA Piper”) to represent Mr. Thornton-Bey for the limited purpose of filing a reply brief in support of the Supplemental Motion (the “Reply”). Mr. Hamill asked Joseph Carey of DLA Piper to assist in representing Mr. Thornton-Bey.

4. On April 17, 2018, this Court granted Mr. Thornton-Bey’s Unopposed Motion for

Temporary Stay to give counsel sufficient time to review Mr. Thornton-Bey's records and further communicate with Mr. Thornton-Bey.

5. On May 31, 2018, we received Mr. Thornton-Bey's records from Cook County, thereby allowing us to sufficiently analyze Mr. Thornton-Bey's case.

6. The current deadline for the Reply is July 9, 2018.

7. With apologies to the Court, we need additional time to complete the Reply and consult with our client. Mr. Hamill and Mr. Carey have had numerous court deadlines in another case, and Mr. Hamill will be on a long-planned vacation the week of July 4th. We are requesting that the Court grant us until July 17th, 2018 to file the Reply.

8. Counsel for the United States informed counsel for Mr. Thornton-Bey that the government did not oppose the eight-day extension requested by Mr. Thornton-Bey's counsel.

Wherefore, Mr. Thornton-Bey respectfully requests that the Court enter an order granting Mr. Thornton-Bey until July 17th, 2018 to file his reply brief in support of his *Supplemental Motion for Relief Under 28 U.S.C. § 225 Pursuant to Johnson v. United States*.

Dated: June 26, 2018

Respectfully submitted,

DEJUAN THORNTON-BEY

By: /s/ Joseph M. Carey

John J. Hamill
john.hamill@dlapiper.com
Joseph M. Carey
joe.carey@dlapiper.com
DLA PIPER LLP (US)
444 West Lake Street, Suite 900
Chicago, Illinois 60606
Tel: 312.368.7036/2113
Fax: 312.251.5809/312.630.7313